

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

IN RE PORK ANTITRUST
LITIGATION

Civil No. 18-1776 (JRT/HB)

This Document Relates to:

Consumer Indirect Purchaser Plaintiff
Actions

**DECLARATION OF SHANA E. SCARLETT IN SUPPORT OF
INDIRECT PURCHASERS' OPPOSITION TO DEFENDANTS' JOINT
MOTION TO DISMISS THE STATE LAW CLAIMS IN THE INDIRECT
PURCHASER PLAINTIFFS' COMPLAINTS**

I, Shana E. Scarlett, state under oath, as follows:

1. I am a partner at Hagens Berman Sobol Shapiro LLP. I have full knowledge of the matters stated herein and could and would testify thereto.
2. Attached are the true and correct copy of the following exhibits:
 - Exhibit A: Notice of Filing of the Complaint to the Arizona Attorney General;
 - Exhibit B: Notice of Filing of the Complaint to the Nevada Attorney General;
 - Exhibit C: Notice of Filing of the Complaint to the Utah Attorney General; and
 - Exhibit D: Notice of Filing of the Complaint to the Hawaii Attorney General.

I certify under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

DATED: November 30, 2018

s/ Shana E. Scarlett

SHANA E. SCARLETT

EXHIBIT A



HAGENS BERMAN

Steve W. Berman
HAGENS BERMAN SOBOL SHAPIRO LLP
 1918 EIGHTH AVENUE, SUITE 3300
 SEATTLE, WA 98101
www.hbsslaw.com
 Direct (206) 268-9320
steve@hbsslaw.com

June 28, 2018

PAD/CPA

VIA CERTIFIED MAIL

JUL 03 2018

Mark Brnovich
 Attorney General of Arizona
 2005 N Central Ave
 Phoenix, AZ 85004-2926

RECEIVED

Re: Duryea et. al. v. Agri Stats et. al., Case No. 0:18-cv-001176

To the Office of the State Attorney General:

We write to inform you of newly-filed consumer protection and antitrust action which may affect your state's consumers. Enclosed please find a copy of the complaint.

The complaint alleges that from approximately 2009 to the present, U.S. pork producers engaged in unfair and deceptive trade practices. The producers conspired to fix, raise, maintain and stabilize the price of pork. They implemented this conspiracy by coordinating output and limiting production using a benchmarking service, Agri Stats. In furtherance of this conspiracy, we allege that the pork producers exchanged detailed, competitively sensitive, and closely guarded non-public information about prices, capacity, sales volume and demand with their co-conspirators. In essence, the defendants established, maintained, or used a monopoly for the purpose of excluding competition and controlling, fixing, or maintaining prices in the pork market.

Should you have any questions regarding the litigation, I may be reached at the address written above.

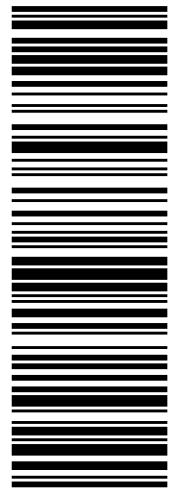
Sincerely,

HAGENS BERMAN SOBOL SHAPIRO LLP

Steve W. Berman
 Partner

Enclosure: Class Action Complaint

062S0006248683

**9402 6118 9956 0372 8272 05**

Jeaneth Decena
Hagens Berman Sobol Shapiro LLP
715 Hearst Ave., Suite 202
Berkeley CA 94710

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EXHIBIT B



HAGENS BERMAN

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steve@hbsslaw.com

June 28, 2018

VIA CERTIFIED MAIL

Adam Laxalt
Attorney General of Nevada
Grant Sawyer Building
555 E. Washington Avenue, Suite 3900
Las Vegas, NV 89101

Re: Duryea et. al. v. Agri Stats et. al., Case No. 0:18-cv-001176

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We write to inform you of newly-filed consumer protection and antitrust action which may affect your state's consumers. Enclosed please find a copy of the complaint.

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Sincerely,

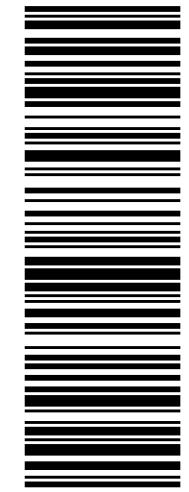
HAGENS BERMAN SOBOL SHAPIRO LLP

A handwritten signature in blue ink that reads "Steve W. Berman".

Steve W. Berman
Partner

Enclosure: Class Action Complaint

062S0006248683



Jeaneth Decena
Hagens Berman Sobol Shapiro LLP
715 Hearst Ave., Suite 202
Berkeley CA 94710

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HAGENS BERMAN

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Direct (206) 268-9320
steve@hbsslaw.com

June 28, 2018

VIA CERTIFIED MAIL

Sean D. Reyes
Attorney General of Utah
Utah State Capitol Complex
350 North State Street Suite 230
SLC UT 84114-2320

Re: Duryea et. al. v. Agri Stats et. al., Case No. 0:18-cv-001176

To the Office of the State Attorney General:

We write to inform you of newly-filed consumer protection and antitrust action which may affect your state's consumers. Enclosed please find a copy of the complaint.

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Sincerely,

HAGENS BERMAN SOBOL SHAPIRO LLP



Steve W. Berman
Partner

Enclosure: Class Action Complaint

062S0006248683



Jeaneth Decena
Hagens Berman Sobol Shapiro LLP
715 Hearst Ave., Suite 202
Berkeley CA 94710

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SLC UT 84114-0002

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steve@hbsslaw.com

June 28, 2018

VIA CERTIFIED MAIL

Russell Suzuki
Attorney General of Hawaii
Department of the Attorney General
425 Queen Street
Honolulu, HI 96813

Re: Duryea et. al. v. Agri Stats et. al., Case No. 0:18-cv-001176

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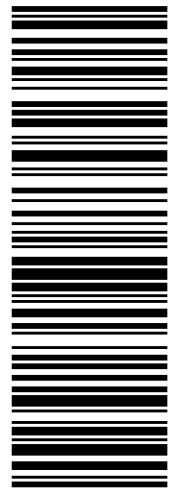
Sincerely,

HAGENS BERMAN SOBOL SHAPIRO LLP

Steve W. Berman
Partner

Enclosure: Class Action Complaint

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425 Queen Street
Honolulu HI 96813-2903

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